

From: GARY LIGHTMAN garylighman@lightmanlaw.com
Subject: Re: ShareFile Activity Notification - SafetyHouse v. Gross
Date: May 5, 2024 at 11:55 PM
To: Laver, Seth L. slaver@goldbergsegalla.com
Cc: Ross, Joseph jross@goldbergsegalla.com, Pat Healey phealey@rebarkelly.com, Kim DiTomaso kditomaso@lightmanlaw.com, Glenn Manochi gmanochi@lightmanlaw.com, GARY LIGHTMAN ltag8r@me.com
Bcc: Dan Scully Dans@thesafetyhouse.com, Kim DiTomaso kditomaso@lightmanlaw.com

Seth,

In response to your below email:

You write in your below email that "How you bill your client is your business, but it is noteworthy that you took the time to threaten "A BIG PROBLEM" based upon discovery responses that we haven't even provided yet."

But you sent us two emails with ShareFiles on April 29, 2024 (copies of those emails are included in your below email), but we could not access any of the files in your ShareFile system from either email. That's why we sent you our 4/29/24 email that we did. You did not recall your emails, or inform us that they were premature productions, until after we sent you our below 4/29/24 email.

And if the actual additional documents you plan to produce are more of the docs that were labelled in your 4/29 emails (instead of the docs we set forth in the 3/7/24 Document Requests, and what we highlighted for you in our 4/29 email back to you), then we are going to have a BIG PROBLEM. **Please make sure that the documents you produce include the documents in our below 4/29/24 email, to avoid any problem.**

As for how we bill our client, you should make sure that you have an appropriate "cya" doc in your file. Instead of settling this case by getting Manfred (together with Sam, and Gary, and Daphna), to give TSH back the \$2 million that defendants defrauded out of plaintiff, apparently you are comfortable billing your clients each month to continue to try to defend against their wrongful fraud scheme. We are going to recover a \$2 million fraud judgment, and a \$10-\$20 million punitive damages judgment, against all defendants—the fraud scheme they practiced on TSH, and VRC, and the other victims, is abhorrent and asocial and wrong. And Manfred most of all is NOT going to be happy with you, when we do. Manfred will be the one most adversely affected—Sam doesn't care about TSH's claims (Sam has much more substantial other criminal claims to deal with, and he already has substantial judgments against him); Daphna also has more substantial other criminal claims to deal with; and Gary thinks he is judgment proof. Your guy has the sterling Houston reputation, and the assets, and the most to lose. But keep on billing him, by all means—someone on the other side should make tons of money from this case.

We look forward to getting the additional documents from the Sternberg Defendants, as you promise in your below email.

thx
 Gary Lightman
 cell 215-760-3000

On May 3, 2024, at 2:39 PM, Laver, Seth L. <slaver@goldbergsegalla.com> wrote:

Gary,

I just tried you on your cell.
 I write with an update on the status of my clients' responses to Plaintiff's Third Set of Document Requests.

First, did you actually send pushback on a production we'd yet to publish? How you bill your client is your business, but it is noteworthy that you took the time to threaten "A BIG PROBLEM" based upon discovery responses that we haven't even provided yet. I thought we agreed to proceed professionally here.

In any event, I will soon update the online portal with materials responsive to the Third Set of Requests. We've included a written response as well. You will find responses to everything, including the results of a forensic email search. By Monday I will update the portal with the results of the forensic search of text messages. Soon thereafter I should be in a position to produce the WhatsApp messages. Everything else is on the portal. We've spent many hours preparing these responses.

Once we complete this production, we will turn our attention to your incomplete and objectionable responses to my clients' requests. But that is a conversation for another day.

Let me know if you have any questions.
 Enjoy the weekend.

Seth L. Laver, Esq.

Partner

Admitted in PA, NJ and NY

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From: Gary Lightman <garylighman@lightmanlaw.com>

Sent: Monday, April 29, 2024 3:54 PM

To: Laver, Seth L. <slaver@goldbergsegalla.com>; Ross, Joseph <jross@goldbergsegalla.com>

Cc: K. DiTomaso <kditomaso@lightmanlaw.com>; G. Manochi <gmanochi@lightmanlaw.com>; GARY LIGHTMAN <ltag8r@me.com>

Subject: Re: ShareFile Activity Notification

Seth(and Joseph),

Please don't just send us a bunch of unnumbered pdf files.

Please send us a formal written response, as well as all of the responsive documents with document numbers on them

thx
Gary Lightman
cell 215-760-3000

PS, if the titles to the documents you are producing in your below are accurate, WE ARE GOING TO HAVE A BIG PROBLEM, because you are not giving us responsive docs, you are just giving us the same junk you already produced (most of which are TSH docs):

Where are the docs pertaining to Manfred's new law practice (3/7/24 D/R #1 and 2)?

Where are the reservation of rights letters dated 9/6/22 and 7/18/23 that are referred to in the first paragraph of, and incorporated into, the 2/9/24 ROR letter from Attorney Protective that Seth Laver produced for us in Seth's 2/22/24 email (3/7/24 D/R #4)?

Where are the documents reflecting each of the payments made by Gross to Sternberg, or taken by Sternberg, for attorney fees (3/7/24 D/R #4)?

Where are the documents requested during the deposition of Manfred Sternberg conducted on February 7, 2024 (3/7/24 D/R #9 in general, and set forth by reference to the transcript in D/R nos. 19-37)?

Where are the documents comprising the metadata for the April 5, 2021 fee agreement (that was produced for the first time on 2/22/24), that Sternberg entered into with the Gross Defendants (the "4/5/21 Sternberg-Gross Fee Agreement"), that show (a) when that fee agreement initially was created, and (b) each time the document was accessed and/or modified; and the documents evidencing how the 4/5/21 Sternberg-Gross Fee Agreement was transmitted to the Gross Defendants; and the documents evidencing when the 4/5/21 Sternberg-Gross Fee Agreement was signed by the Gross Defendants, and transmitted back to Sternberg (3/7/24 D/R #10-12)?

Where are the documents comprising the transactions with the other people and/or entities victims (you call them purchasers, we call them victims), including: George Gianforaro and/or Indutex USA (3/7/24 D/R #16); and Daniel Rodin (3/7/24 D/R #17); and George Carcia-Mendocal, Esquire (3/7/24 D/R #18); and the other purchasers (3/7/24 D/R #19)?

Where are all of the text and WhatsApp messages to or from Manfred (3/7/24 D/R #39)?

PLEASE MAKE SURE THAT THE STERNBERG DOCUMENT PRODUCTION THAT YOU STATE IN YOUR BELOW EMAIL THAT YOU INTEND TO PRODUCE BY THE END OF THIS WEEK, ALSO INCLUDES THE AFOREMENTIONED DOCUMENTS.

thx
Gary Lightman
cell 215-760-3000

On Apr 29, 2024, at 3:32 PM, Laver, Seth L. <slaver@goldbergsegalla.com> wrote:

Gary,

We're working on our responses to the plaintiff's document requests. I will advise when it is ready.
There is nothing for you to review yet but the goal is to complete production by the end of the week at the latest.

Seth L. Laver, Esq.

Partner

Admitted in PA, NJ and NY

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From: Gary Lightman <garyl@lightmanlaw.com>
Sent: Monday, April 29, 2024 3:24 PM
To: Laver, Seth L. <slaver@goldbergsegalla.com>
Cc: K. DiTomaso <kditomaso@lightmanlaw.com>; G. Manochi <gmanochi@lightmanlaw.com>
Subject: Fwd: ShareFile Activity Notification

Seth,

We cannot open any of the docs you sent us for the Sternberg Defendants in your below email — when we try to open them, we get the following error message:

Adobe Acrobat could not open 'BOL sh3 3_21_22.pdf' because it is either not a supported file type or because the file has been damaged (for example, it was sent as an email attachment and wasn't correctly decoded).

To create an Adobe PDF document, go to the source application. Then choose Save as Adobe PDF from the PDF dropdown in the Print dialog.

Please resend us the docs so we can open and review them, asap

thx
Gary Lightman
cell 215-760-3000

Begin forwarded message:

From: "ShareFile Notifications (No Reply)" <noreply@sf-notifications.com>
Subject: ShareFile Activity Notification
Date: April 29, 2024 at 3:17:37 PM EDT
To: garylighman@lightmanlaw.com



Notification Summary

Below is a summary of upload and download activity on folders for which you've chosen to be notified.

Uploads

[slaver@goldbergsegalla.com > AEC v. Gross, et al > Supp. Production Apr. 2024](#)

-  **[Purchase Order_18316_1642800724065.pdf](#)**
 Size 0.00 B
 Created 04/29/2024 3:14:39 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[Safety House 316 SALE AND PURCHASE AGREEMENT.docx](#)**
 Size 0.00 B
 Created 04/29/2024 3:14:25 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[Scan 1-21.pdf](#)**
 Size 0.00 B
 Created 04/29/2024 3:13:18 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[BOL sh3 3_21_22.pdf](#)**
 Size 0.00 B
 Created 04/29/2024 3:12:07 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[BOL sh4 3_22_22.pdf](#)**
 Size 0.00 B
 Created 04/29/2024 3:12:05 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[BOL sh5 PA 1 PALLET 03-24-2022.pdf](#)**
 Size 0.00 B
 Created 04/29/2024 3:12:04 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[BOL sh6 PA 2 PALLETS.pdf](#)**
 Size 0.00 B
 Created 04/29/2024 3:12:03 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[BOL sh7_1452530.pdf](#)**
 Size 0.00 B
 Created 04/29/2024 3:11:50 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[Executed Bill fo Sale Safety House.pdf](#)**
 Size 0.00 B
 Created 04/29/2024 3:11:28 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[Napalotano Letter.pdf](#)**
 Size 0.00 B
 Created 04/29/2024 3:11:13 pm
 Creator Seth Laver (slaver@goldbergsegalla.com) (Goldberg Segalla)
-  **[rejection of product Scully.pdf](#)**

Size 0.00 B
Created 04/29/2024 3:10:58 pm
Creator Seth Laver [slaver@goldbergsegalla.com] (Goldberg Segalla)



E-mails from Gary L.pdf

Size 0.00 B
Created 04/29/2024 3:08:55 pm
Creator Seth Laver [slaver@goldbergsegalla.com] (Goldberg Segalla)



E-mails regarding Safety House.pdf

Size 0.00 B
Created 04/29/2024 3:08:52 pm
Creator Seth Laver [slaver@goldbergsegalla.com] (Goldberg Segalla)

[Download These Items](#)

slaver@goldbergsegalla.com > AEC v. Gross, et al > Supp. Production Apr. 2024 > Wires



190k Bank of America _Online Banking _Accounts _Account Details _Account Activit y.pdf

Size 0.00 B
Created 04/29/2024 3:10:03 pm
Creator Seth Laver [slaver@goldbergsegalla.com] (Goldberg Segalla)



250k Bank of America _Online Banking _Accounts _Account Details _Account Activit y.pdf

Size 0.00 B
Created 04/29/2024 3:10:01 pm
Creator Seth Laver [slaver@goldbergsegalla.com] (Goldberg Segalla)



1911 AcctNotice_2022-02-04.pdf

Size 0.00 B
Created 04/29/2024 3:09:59 pm
Creator Seth Laver [slaver@goldbergsegalla.com] (Goldberg Segalla)

[Download These Items](#)

Downloads

There is no download activity to report.

Views

There is no view activity to report.

[Click here to change how often ShareFile sends emails](#) Dates are displayed in UTC -5

Need help? We're here for you.
Visit sharefile.com/support and look for "Start chat."

—
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—
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